



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

August 11, 2015

MICHAEL P. FISHMAN, TREASURER
SEIU COPE (SERVICE EMPLOYEES
INTERNATIONAL UNION COMMITTEE ON
POLITICAL EDUCATION)
1800 MASSACHUSETTS AVE NW
WASHINGTON, DC 20036

Response Due Date
09/15/2015

IDENTIFICATION NUMBER: C00004036

REFERENCE: JULY MONTHLY REPORT (06/01/2015 - 06/30/2015)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 1 item(s):

- Schedule B of your report discloses a total of \$849,139.44 in payments to your connected organization for "Reimbursement for Political Program Support Grants" and "Reimbursement for Federal PAC Fundraising Awards". Please be advised that 52 U.S.C. §30118 (formerly 2 U.S.C. §441b) prohibits a corporation or labor organization from contributing funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund. Further, 11 CFR §114.2(f) prohibits corporations and labor organizations from facilitating the making of contributions to candidates or political committees, other than to the separate segregated funds of the corporations and labor organizations. Facilitation means using corporate or labor organization resources or facilities to engage in fundraising activities in connection with any federal election. The use of corporate or labor organization resources in connection with a fundraiser may be permissible for certain fundraising activities only if the corporation or labor organization receives advance payment for the fair market value of such services. (11 CFR §114.2(f)(2)(i)(A), (C) and (E))

Please amend your report to clarify whether the payment to your connected organization was intended to influence federal elections and provide the dates